

EXHIBIT K(1)

Deloitte.

Garcia - Plaintiffs' November 3, 2020 Proposals

Friday, November 13, 2020

Custodians

Anderson, Jerohn; Ashton, Michael; Chen, Chi-Han; Gillies, Mark; Glynn, Carrie; Glynn, Timothy; Hathaway, Jed; Holtz, David; MacKnight, Andrew; Martell, Robert; McCarthy, Robert; McReynolds, Gregory; Reel, Bryan; Sandvig, Christopher; Slatton, Steven; Stowe, Patrick; Vazin, Scott; Wolynec De Freitas, Ana

Relevant Time Period

1/1/2007 to 3/21/2019

Total Number of Hits: 187,898**Total Number of Hits + Family: 414,146**

Search Strings	Search String #	Hits	Unique Hits
"Ricardo Garcia" OR "Duane Glover" OR "Paul Jacobson" OR "Gaetano Calise" OR "Mykhaylo Holovatyuk" OR "Brian Garcia" OR "Paul Thomson" OR "David Hartman" OR "Dave Hartman" OR WVWLF7AU2FW135993 OR WVGBV7AX1DW558422 OR WVWAP7AN6FE817987 OR WVWGU7AN3DE556558 OR WVWBN7AN3DE507979 OR 3VW4T7AU7HM001719 OR 3VW017AU4HM500479 OR WVGEPE9BP1ED001525	1	5,018	743
1,541 VINS listed in Exhibit A to VWGoA's supplemental interrogatory responses	2	55,696	46,201
(To/From/CC/BCC: @dot.gov OR @justiz.niedersachsen.de) AND 18V329 OR 18-V-329 OR 18V-329 OR 18-V329 OR 19V679 OR 19-V-679 OR 19V-679 OR 19-V679 OR 01C5 OR 01C6 OR 01D7 OR 0-series or 0series or "0 series" or "zero series" or zero-series or pre-series or preseries or "pre series" or preproduction or "pre production" or pre-production or "early production"	3	29	1
(To/From/CC/BCC: @vw.com OR @volkswagen.de OR @vw.com.mx) AND (18V329 OR 18-V-329 OR 18V-329 OR 18-V329 OR 19V679 OR 19-V-679 OR 19V-679 OR 19-V679 OR 01C5 OR 01C6 OR 01D7)	4	1,337	275
(To/From/CC/BCC: @vw.com OR @volkswagen.de OR @vw.com.mx) AND (Odometer OR mileage OR (default* w/10 mileage) OR (10 w/10 mile) OR (ten w/10 mile) OR "10 mile" OR "10 miles" OR (mileage w/5 10) OR (mileage w/5 ten)) AND (title w/5 application)	5	1,064	153
(preproduction OR pre-production OR "pre production" OR preseries OR pre-series OR "pre series" OR zero-series OR "zero series" OR 0-series OR 0series OR "0 series" OR "early production") AND ((audit report" OR "Der Spiegel" OR "PR Number" OR "Option code" OR "ECR" OR "ECN" OR "engineering change order" OR "engineering change notice" OR "engineering change request" OR "Elektronischer Teilekatalog" OR ETKA) OR ((comply* OR compliance OR confirm* OR conform* OR meet OR test*) w/10 ("Federal Motor Vehicle Safety Standards" OR "FMVSS")))	6	3,596	1,135
(To/From/CC/BCC @carfax.com) AND contract OR Agreement	7	99	92
(To/From/CC/BCC: @vw.com OR @volkswagen.de OR @vw.com.mx) AND "Carfax price calculator"	8	0	0
Carfax AND ((Certificate w/10 "buyback guarantee") OR "daily data" OR "data feed")	9	179	61
((Certificate w/5 alter*) OR (alter* or modif* or retrofit* w/10 (manufactur* w/5 (post* OR after)))	10	207	46
("Conformity of Production" or COP) AND ("Process Standard" or "Quarterly Report" or "Annual Report")	11_1	1,019	603
("Conformity of Production" or COP) AND ((CQ-A or QS or EKSP or CQ-P) AND (non-compliance or noncompliance or "out of compliance" or noncompliant or "not compliant" or "do not comply" or "does not comply" or illegal or improper or "cannot be certified" or "saleable with limitations" or "not saleable" or scrap or scrapped or scrapping))	11_2	1,305	486
("Conformity of Production" or COP) AND (60055 or 4889600 or E-tag or Etag or PARS or "Project Appropriation Request" or "Project Appropriation Request" or "sold retail" or (retail w/5 sale) or VCI or "VW Credit" or auction or "auction system")	11_3	1,506	570
("Federal Safety Standards" or FSS or "Federal Motor Vehicle Safety Standards" or FMVSS) AND (noncompliance or noncompliance or "out of compliance" or noncompliant or "not compliant" or "do not comply" or "does not comply" or illegal or improper or "cannot be certified" or "saleable with limitations" or "not saleable" or scrap or scrapped or scrapping)	11_4	7,891	4,803
(0-series or 0series or "0 series" or "zero series" or "zero-series" or pre-series or preseries or "pre series" or preproduction or "pre production" or pre-production or "early production") AND ("Federal Safety Standards" or FSS or "Federal Motor Vehicle Safety Standards" or FMVSS)	11_5	1,527	122

(0-series or Oseries or "zero series" or zero-series or pre-series or preseries or "pre series" or preproduction or "pre production" or "early production") AND (non-compliance or noncompliance or "out of compliance" or noncompliant or "not compliant" or "do not comply" or "does not comply" or illegal or improper or "cannot be certified" or "saleable with limitations" or "not saleable" or scrap or scrapped or scrapping or "internal use only")	11_6	8,689	2,814
("Certificate of Title" or "original title" or "title application" or (appl* w/5 title)) AND ((7,500 or 7500) or preregistration or VCI or "VW Credit" or auction or "auction system" or CPO or "certified pre-owned" or "certified pre owned")	11_7	5,283	3,195
(Odometer or miles or mileage) AND (inaccurate or "not accurate" or non-compliance or noncompliance or "out of compliance" or noncompliant or "not compliant" or "non compliant" or "non-compliant" or "do not comply" or "does not comply" or illegal or improper or "cannot be certified" or "saleable with limitations" or "not saleable" or false or perjury or jail or prison or truth or truthful)	11_8	37,734	14,144
((sales w/3 (strategy* OR plan OR project*)) OR "market share" OR profitability) AND ("certified preowned" OR "certified pre owned" OR "certified pre-owned" OR CPO)	12	6,895	4,733
((certificate* w/5 manufacturer*) OR (certificate* w/5 alter*) OR MCO) AND (affix* OR issu* OR issuance OR complete OR appl*)	13	6,831	5,081
("Federal Safety Standards" or FSS or "Federal Motor Vehicle Safety Standards" or FMVSS) AND ("591.5" or "591.7" or "re-exported" or destroyed or donated or retro*)	14	2,752	701
("0-series" or "Oseries" or "0 series" or "zero series" or "zero-series" or "pre-series" or preseries or "pre series" or preproduction or "pre production" or "pre-production" or "early production" or prototype) AND ("591.5" or "591.7" or "re-exported" or destroyed or donated)	15	7,567	4,338
("imported solely for the purpose of research, investigations, demonstrations or training, or competitive racing")	16	293	0
((modif* w/5 vehicle*) and Puebla)	17	702	224
("0-series" or "Oseries" or "0 series" or "zero series" or "zero-series" or "pre-series" or preseries or "pre series" or preproduction or "pre production" or "pre-production" or "early production" or prototype or "series production") AND (retro* or modif*) AND (document* or record*)	18	15,244	2,609
(noncompliance or "non-compliance" or "out of compliance" or noncompliant or "not compliant" or "do not comply" or "does not comply" or illegal or improper or "cannot be certified" or "saleable with limitations" or "not saleable" or scrap or scrapped or scrapping) AND (retro* or modif*) AND (document* or record*)	19	21,782	6,055
("0-series" or "Oseries" or "0 series" or "zero series" or "zero-series" or "pre-series" or preseries or "pre series" or preproduction or "pre production" or "pre-production" or "early production" or prototype or "series production") AND (audit or "17,000" or 17000 or "9,063" or 9063)	20	10,545	3,808
("0-series" or "Oseries" or "0 series" or "zero series" or "zero-series" or "pre-series" or preseries or "pre series" or preproduction or "pre production" or "pre-production" or "early production" or prototype or "series production") AND ("Der Spiegel" or "https://www.spiegel.de*")	21	979	16
(mole or informant or whistleblower or rat or snitch*) AND ("Der Spiegel" or "https://www.spiegel.de*")	22	241	14
"price calculator" AND Carfax AND (profit* or reven* or sale* or residual)	23	94	81
importer w/3 code w/3 922	24	104	39
(BID* w/5 change*) AND (922 or 499 or 444 or CP8)	25	2,136	1,239
To/From/CC "tim.glynn@vw.com" AND (noncompliance or "non-compliance" or "out of compliance" or noncompliant or "not compliant" or "do not comply" or "does not comply" or illegal or improper or "cannot be certified" or "saleable with limitations" or "not saleable" or scrap or scrapped or scrapping or exported or "re-exported" or destroyed or donated or retro*)	26	4,705	3,300
To/From/CC "Chi-Han.Chen@vw.com" AND ("0-series" or "Oseries" or "0 series" or "zero series" or "zero-series" or "pre-series" or preseries or "pre series" or preproduction or "pre production" or "pre-production" or "early production" or CP8)	27	18,652	14,077
S7Q or S99 or SAO or SJO	28	25,906	21,968
"20V-561" or 20V561 or 01E9	29	14	7
"caution: preproduction model"	30	0	0
"vehicle contains special equipment/fixtures that are not documented in the genuine parts catalogue"	31	22	0
(increase* w/3 risk) AND (crash or fire or injury) AND (18V329 OR "18-V-329" OR "18V-329" OR "18-V329" OR 19V679 OR "19-V-679" OR "19V-679" OR "19-V679" OR 01C5 OR 01C6 OR 01D7 OR 01E9 OR "20V-561" OR 20V561)	32	166	0
("0-series" or "Oseries" or "0 series" or "zero series" or "zero-series" or "pre-series" or preseries or "pre series" or preproduction or "pre production" or "pre-production" or "early production" or prototype or "series production") AND ((crash w/3 rating) or (crash w/3 worth*) or (safety w/3 impact*) or iihs or "iihs.org" or "Insurance Institute for Highway Safety")	33	4,808	410

(fals* or inaccurate or mislead*) w/20 (mile* or odometer or (title w/5 application) or (use w/5 history))	34	5,713	199
(file w/4 feed) AND Carfax	35	16	12